

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO (COLUMBUS)**

IN RE:

CASE NO. 2:17-bk-55129

Margaret Ann Miller

CHAPTER 13

Debtor.

JUDGE: C. Kathryn Preston

OBJECTION TO CHAPTER 13 PLAN

Bridgecrest Credit Company LLC, an affiliated company of DT Acceptance Corp, ('Creditor'), by and through its undersigned counsel, hereby objects to confirmation of the Debtor's proposed Chapter 13 Plan (Doc. 5) (the "Plan"). This Objection is hereby supported by the following memorandum.

MEMORANDUM

1. Margaret Ann Miller ("Debtor") is the owner of a 2004 VOLVO XC90 AWD 6C - VIN YV1CZ91HX41122127 ('Vehicle') which was purchased on or around June 13, 2013. A true and correct copy of the Certificate of Title for a Vehicle is attached hereto as Exhibit A.
2. Creditor is the holder of a claim secured by the Vehicle more particularly described in the Simple Interest Retail Installment Contract, executed by Debtor, a copy of which is attached hereto as Exhibit B.
3. Creditor perfected an interest in the Vehicle, more particularly described in the Certificate of Title for a Vehicle.
4. Creditor, Bridgecrest Credit Company LLC is an affiliated company of DT Acceptance Corp. as evidenced by Exhibit C.
5. The Debtor's bankruptcy was filed on August 10, 2017.
6. Creditor objects to Confirmation of the Plan on several grounds, including:
 - a. The Plan does not adequately state the value of the Vehicle's worth, pursuant to the NADA value, as evidenced by Exhibit D.
 - b. Creditor states that the Plan herein does not adequately protect the Creditor's interest in said Vehicle and should be denied confirmation.
7. Creditor reserves the right to amend this Objection.

WHEREFORE, Bridgecrest Credit Company LLC, an affiliated company of DT Acceptance Corp, prays that this Court deny confirmation of the Chapter 13 Plan (Doc. 5), and that Creditor be awarded such other and further relief as is just and proper.

Respectfully Submitted,

/s/ Daniel A. Cox

Daniel A. Cox (28426-15)
Wood & Lampung LLP
Attorney for Plaintiff
600 Vine Street, Suite 2500
Cincinnati, OH 45202
Voice: (513) 852-6043
Fax: (513) 419-6443
bankruptcy@woodlamping.com

CERTIFICATE OF SERVICE

I certify that on September 6, 2017, a copy of the foregoing Notice of Appearance was filed electronically. Notice of this filing will be sent to the following party/parties through the Court's ECF System. Party/parties may access this filing through the Court's system:

Pamela N. Maggied, Debtor's Counsel, maggiedlaw@midohio.twcbc.com

Frank M Pees, Trustee, trustee@ch13.org.com

United States Trustee, Ustpregion09.cb.ecf@usdoj.gov

I further certify that on September 5, 2017, a copy of the foregoing Notice of Appearance was mailed by first-class U.S. Mail, postage prepaid and properly addressed to the following:

Margaret Ann Miller, 2258 Jermain Drive, Columbus, OH 43211

/s/ Daniel A. Cox
Daniel A. Cox (28426-15)